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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
(Honorable Edward F. Shea)

UNITED STATES OF AMERICA,) Case No.: 4:15-CR-06049-EFS-11
)
Plaintiff,) MOTION TO EXPEDITE
)
vs.) WITHOUT ORAL ARGUMENT
) (February 17, 2017 at 6:30 p.m.)
SALVADOR GUDINO CHAVEZ,)
)
Defendant)
)

COMES NOW the Defendant, Salvador Gudino Chavez, by and through his attorney of record, Gregory L. Scott, and asks the Court to expedite the hearing on the Defendant's Motion for Waiver of Right to Attend Pretrial Hearing.

This motion is based upon the files and records herein and the attached declaration of Gregory L. Scott.

DATED this 17th day of February, 2017.

s/Gregory L. Scott

WSBA #17433

Attorney for Salvador G. Chavez

1 DECLARATION OF GREGORY L. SCOTT

2
3 I, Gregory L. Scott, am competent to testify to the matters
4 contained herein and do so on the basis of information and belief.

5 The pretrial hearing on this matter is currently scheduled for
6 February 21, 2017. Therefore we request an expedited hearing on our
7 motion for waiver of presence.

8 I declare under penalty of perjury pursuant to the laws of the
9 State of Washington that the foregoing statements are true and
10 correct.

11 DATED this 17th day of February, 2017.

12 s/Gregory L. Scott

13 _____
14 WSBA #17433

15 Attorney for Salvador G. Chavez
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1 I hereby certify that on February 17, 2017, I electronically
2 filed the foregoing with the Clerk of the Court using the CM/ECF
3 System which will send notification of such filing to the following,
4 and/or I hereby certify that I have mailed by United States Postal
5 Service the document to the following non-CM/ECF participants:

6
7 Stephanie Van Marter
8 Assistant United States Attorney
9 United States Attorneys Office
10 920 W. Riverside, Suite 300
11 P.O. Box 1494
12 Spokane, WA 99210-1491

13 s/Gregory L. Scott
14 WSBA #17433
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